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Proposed Attorneys for the Debtor  
and Debtor in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:	
IN RE:	:	
	:	Chapter 11
NEWLAND INTERNATIONAL	:	
PROPERTIES, CORP.,	:	Case No. 13-11396 (MG)
	:	
DEBTOR.	:	
	:	
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**NOTICE OF COMMENCEMENT OF  
CHAPTER 11 CASE AND FILING OF FIRST DAY MOTIONS**

**PLEASE TAKE NOTICE** that, on April 30, 2013, Newland International Properties, Corp., as debtor and debtor in possession (the “***Debtor***”), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “***Bankruptcy Code***”) in the United States Bankruptcy Court of the Southern District of New York (the “***Bankruptcy Court***”).

**PLEASE TAKE FURTHER NOTICE** that in connection with the Debtor’s chapter 11 case, some or all of the motions set forth below may be heard at the hearing scheduled for **May 1, 2013 at 11:00 a.m. (prevailing Eastern time), before The Honorable Martin Glenn, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004**, or at such other time as the Court may determine:

1. Debtor's Motion for Entry of an Order (A) Providing Extension of Time to File Schedules and Statements of Financial Affairs; and (B) Waiving Requirement to File Same if Plan Becomes Effective Prior to Expiration of Such Extension (the "***Schedules and Statements Motion***");

2. Debtor's Motion for Entry of an Order Confirming the Protections of Sections 362 and 365 of the Bankruptcy Code and Restraining Any Action in Contravention Thereof (the "***Automatic Stay Motion***");

3. Debtor's Motion for an Order (A) Waiving the Requirement That the Debtor File a List of Creditors and Equity Security Holders and Authorizing Maintenance of List of Creditors in Lieu of Matrix and (B) Approving Notice, Case Management, and Administrative Procedures (the "***Case Management Procedures Motion***");

4. Debtor's Motion for Entry of an Order Authorizing the Debtor to (A) Pay Certain Prepetition Wages, Salaries, and Reimbursable Employee Expenses, (B) Pay and Honor Employee Medical and Similar Benefits, and (C) Continue Employee Compensation and Employee Benefit Programs (the "***Employee Wage and Benefits Motion***");

5. Debtor's Motion for Entry of an Order (I) Authorizing Debtor to Continue Existing Cash Management System, Bank Accounts, and Business Forms and (II) Granting an Extension of Time to Comply With the Requirements of Section 345(b) of the Bankruptcy Code (the "***Cash Management Motion***");

6. Debtor's Motion for an Order (A) Authorizing Debtor to Pay Certain Prepetition Claims of Foreign Creditors; and (B) Authorizing Financial Institutions to Honor and Process Related Checks and Transfers (the "***Foreign Creditor Motion***");

7. Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral and (II) Scheduling a Final Hearing (the "***Cash Collateral Motion***");

8. Debtor's Motion for Prepackaged Chapter 11 Case and (I) for an Order (A) Scheduling a Combined Hearing to Consider the Adequacy of the Disclosure Statement and Confirmation of the Plan, (B) Establishing Deadlines for Procedures to File Objections, and (C) Approving the Form and Manner of the Notice of the Combined Hearing, and (II) for an Order (A) Approving the Solicitation Procedures, (B) Approving the Adequacy of the Disclosure Statement, and (C) Confirming the Plan (the "***Scheduling Motion***"); and

9. Debtor's Application for an Order Appointing Epiq Bankruptcy Solutions, LLC as Claims and Noticing Agent for the Debtor Pursuant to 28 U.S.C. § 156(c), 11 U.S.C. § 105(a) and Local Bankruptcy Rule 5075-1 and Granting Related Relief (the "***Epiq 156(c) Retention Application***").

**PLEASE TAKE FURTHER NOTICE** that copies of the above-referenced motions and applications filed with the Bankruptcy Court can be obtained on the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's case filing system or the Debtor's restructuring website at <http://dm.epiq11.com/newland>, or from counsel for the Debtor as set forth below.

**PLEASE TAKE FURTHER NOTICE** that no written objection to the Motions are required to be filed prior to the hearing. Any objections may be interposed at the hearing.

Dated: April 30, 2013  
New York, New York

Respectfully submitted,

/s/ J. Eric Wise

J. Eric Wise

Shira D. Weiner

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